Tax Updates

1st Semester 2023

Legal and Tax Advisoring
Grant Thornton Tax & Legal
Côte d'Ivoire

Abidjan-Plateau
Rue du commerce
Immeuble Nabil, 1er floor
01 BP 12721 Abidjan 01

T +225 27 20 30 77 00
F +225 27 20 30 77 01

www. grantthornton.ci

Dear Reader,

In this new format, we bring you the latest tax news from selected countries in French-speaking Africa.

Against a turbulent economic and political backdrop, most countries are continuing to implement strong support measures for their populations, as well as strict measures to rationalize government spending.

We hope you enjoy reading this newsletter and remain available to assist you in understanding or implementing these measures in your business.

In brief - Key points

Benin
- Clarification of taxation of provisions for loses set aside by property and casualty insurance companies.

Burkina Faso
- Clarification of tax accreditation requirements for non-resident companies and entities in Burkina Faso
- Details of the content and procedures for concluding and terminating prior agreements on transfer pricing
- Setting contribution rates for branches of the social security system

Côte d'Ivoire
- Cohabitation between the Additional Act no. A /SA.5/12/18 on the avoidance of double taxation with respect to taxes on income, capital and inheritance, and the prevention of fiscal fraud and evasion between ECOWAS member states and the UEMOA regulation.

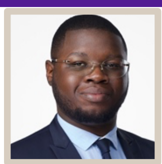
Mauritania
- Introduction of a Special Tax on Telecommunications Services (TSST)

Niger
- Introduction of new social security contribution rates

DRC
- Introduction of a benchmark for the taxation of expatriate remuneration under the professional tax on remuneration (IPR) and the exceptional tax on expatriate remuneration (IERE).

Your contacts

Jean-Louis Dattié
Senior Partner
E: jean-louis.dattie@ci.gt.com



Charles-Alexandre Koffi
Senior Associate
E: charles.koffi@ci.gt.com

BENIN

Benin's tax authorities have issued several circulars clarifying the tax situation.

1. Clarification of the requirements for consultancy firms to assist and represent taxpayers in various tax proceedings before the tax authorities.

In circular no. 0639/MEF/DC/SGM/DGI dated May 15, 2023, the Head of the Tax administration specifies that consulting firms must meet the following conditions:

- Have an appointment mandate issued by the represented taxpayer. This mandate must be registered and communicated in advance to the Administration within fifteen (15) days of the appointment.
- To provide legal, accounting and tax assistance as a company duly incorporated in the Republic of Benin.
- Be listed in the tax authorities' file of active taxpayers and be up to date with their tax obligations.

Tax officials are obliged to check that the consulting firm complies with these conditions before any information is provided.

Failure by civil servants to comply with this requirement is punishable in accordance with the general civil service regulations.

2. Clarification of taxation of provisions for loses set aside by property and casualty insurance companies.

Article 48 of the General Tax Code requires property and casualty insurance companies to pay corporate income tax at a rate of 5% on surplus provisions set aside to cover losses incurred by their customers.

In circular no. 0626/MEF/DC/SGM/DGI/DGE/DLC dated May 10, 2023, the Head of the tax administration specifies that the above obligation applies only to property and casualty insurance companies, i.e., companies providing services in the fire, accident, and miscellaneous risks sector.

Reinsurance companies are therefore excluded from the scope of this obligation.

The circular also specifies that the surpluses referred to in Article 48 of the Tax Code correspond to the positive difference between the provisions recognized in respect of the previous year and the cumulative payments made during the current year, and the provision at year-end.

Consequently, negative surpluses, leading to negative corporate income tax amounts, are not to be considered. These amounts are neither refundable nor deductible from tax due.

In addition, the circular allows reference to table D of the C10B statements provided for in article 422 of the CIMA Code to determine the real value of provisions set aside and payments made.

This table, which is to be used as a reference, details insurance company operations by year of occurrence, and in particular reserves and claims payments for the year in question.

It should be noted that the above-mentioned C10B statements, which must be kept in accordance with the Insurance Code, must in principle be forwarded to the Insurance control commission and the Minister responsible for insurance by the insurance companies concerned

BURKINA FASO

In Burkina Faso, tax news for the first half of 2023 was marked by the publication of various decrees aimed at clarifying the application of current tax laws and practices.

1. Clarification of VAT on cement sales by cement producers and importers

Since the recent adoption of Law no. 029-2022/ALT of December 24, 2022, on the Finance Law for the 2023 financial year, sales made by cement producers and importers have been subject to Value Added Tax.

By Order no. 2023-00149/MEFP/SG/DGI of March 27, 2023, the Minister of the Economy, Finance and Planning clarified the application of VAT on cement.

The tax base (also known as the profit margin) is the difference between the selling price, including all taxes, and the cost price per ton of cement.

The selling price is estimated by the administration based on average market prices.

The cost price is made up of the cost price of purchases or imports of raw materials or products (which are destroyed or lose their quality during a single manufacturing operation) used to produce taxable cement. The value of invoices for energy used directly in production operations (electricity, fuel gas) and plant personnel labor are also considered as costs intrinsic to the cost price.

In principle, VAT paid in this way is not deductible. However, VAT-registered building and public works professionals can deduct the tax on their cement purchases, provided that their tax-registered suppliers mention the tax separately on the invoice.

In addition, professionals in the sector carrying out activities in addition to cement delivery must keep separate accounts, depending on the invoicing method.

2. Details of the composition, powers, operation, and referral procedures of the commission responsible for examining claims and settlements.

Pursuant to the provisions of articles 640 and 650 of the Tax Code, claims or requests for settlements addressed to the Head of the Tax Administration or to the Minister of the Economy, Finance and Planning must be submitted to a commission for assent.

By Order no. 2023-00148/MEFP/SG/DGI of March 27, 2023, the Minister of the Economy, Finance and Planning clarified the composition, powers, operation, and referral procedures of the commission.

In particular, the commission is responsible for:

- Examine requests submitted by taxpayers (tax transaction requests addressed to the Tax administration or the Minister, as well as claims addressed to the Tax administration).
- Hearing applicants ;
- Appreciate the proposals of the departments that examined the appeals.
- Issue a reasoned opinion on the action to be taken on any file examined.
- Produce session reports.

The composition of the commission varies according to the type of request to be examined.

It is referred to by the Tax administration or the Minister of Finance within fifteen (15) days of receipt of the taxpayer's request.

The Commission meets in session within fifteen (15) days of its referral. The duration of the session may not exceed ten (10) days.

After deliberation, the commission has three (3) days to issue its reasoned opinion. This opinion guides the position to be adopted by the Tax administration or the Minister in the reply to be sent to the taxpayer.

3. Clarification of tax accreditation requirements for non-resident companies and entities in Burkina Faso

As a reminder, since the recent adoption of Law no. 029-2022/ALT of December 24, 2022, on the Finance Law for fiscal year 2023, non-resident companies and other entities are required to designate resident representatives to fulfill their reporting and payment obligations for all taxes for which they may be liable, including VAT.

By Order no. 2023-00148/MEFP/SG/DGI of March 27, 2023, the Minister of the Economy, Finance and Planning clarified the status and terms of appointment of the accredited representative.

The following are only admitted as accredited representatives:

- Accounting firms domiciled for tax purposes in Burkina Faso and in compliance with their tax obligations.
- Legal and tax consultancy firms domiciled in Burkina Faso and in compliance with their tax obligations.

An application for an accreditation certificate must be submitted to the Tax administration. The application is processed within seven (7) working days of submission.

The replacement of the accredited representative must be declared by the non-resident company within thirty (30) days of the replacement. The accredited representative, for his part, has a period of (7) working days from termination of the agreement to report the matter to the tax authorities.

4. Clarification of the content and procedures for entering and terminating advance pricing agreements

As a reminder, since the recent adoption of Law no. 029-2022/ALT of December 24, 2022, on the Finance Law for the 2023 financial year, companies operating in Burkina Faso may request the tax authorities to enter into an advance pricing agreement (APA) on the pricing method for future transactions (not exceeding four years) with one or more companies with which they have links of dependence or control within the meaning of the tax provisions in force.

By Order no. 2023-00150/MEFP/SG/DGI of March 27, 2023, the Minister of the Economy, Finance and Planning clarified the content and procedures for entering and terminating the advance pricing agreement.

To be admissible, the request must be reasoned and justified. Prior to submitting an APA request, the Burkina Faso taxpayer requesting the approval must hold a preliminary meeting with the tax authorities to discuss the conditions under which an APA could be requested and examined, and to agree on the documents to be provided in support of the request.

The application must be submitted at least six (6) months before the start of the first financial year concerned.

In any event, the request must clearly specify the purpose of the agreement, the desired duration, and the proposed transfer pricing method, in compliance with the arm's length principle. To this end, the request must be accompanied by several supporting documents, including a detailed study of the search for independent comparable carried out for the application of the proposed transfer pricing method for each transaction.

Once the agreement has been obtained, the tax authorities will no longer be able to call into question the method used to determine the prices of the transactions covered by the agreement, for the tax years covered, unless it is shown that one of the companies concerned by the agreement:

- Has misrepresented facts, withheld information, or made errors or omissions in preparing its application.
- Has not respected the terms of the agreement or has committed fraudulent maneuvers.

5. Setting contribution rates for branches of the social security system

By Decree No. 2023-0129/PRES-TRANSPM/MFPTPS/PEFP, the President of the Transition adjusted the contribution rates for the branches of the social security system as follows:

Payables	Former rates (Decree of May 20, 2003)	New rates (Decree of February 24, 2023)
Employer	16% broken down as follows : - 5.5% for pensions ; - 3.5% for the occupational risks branch. - 7% for the family benefits branch.	16% broken down as follows : - 8.5% for pensions ; - 1.5% for the occupational risks branch. - 6% for the family benefits branch.
Employees	5.5% for the pensions branch	5.5% for the pensions branch 14% for the pension branch for the voluntary insured.

Côte d'Ivoire

In Côte d'Ivoire, tax news for the first half of 2023 was marked by the publication of various service note aimed at clarifying the application of current tax laws and practices.

1. The dematerialization of tax audits

As part of the dematerialization of tax audits instituted by the Finance Law 2023, the tax authorities have set up electronic tax platforms, SIGICI and the e-impôts portal.

The latter is how taxpayers connect to their electronic tax accounts.

SIGICI is Côte d'Ivoire's tax management system, used by the tax authorities in their operations.

The changes now enable documents previously issued and delivered to taxpayers in physical form (audit notices, as well as provisional and final notifications) to be transmitted online via the SIGICI application, and the taxpayer's responses to be posted for the attention of the tax authorities via the e-impôts portal.

2. Exemptions from business license tax for small and medium-sized companies.

In note no. 00329/MBPE/DGI/DLCD-SDPD/EAMD/01-2023 dated January 26, 2023, the tax authorities set out the terms and conditions for benefiting from the five-year exemption from the business license tax introduced by the 2019 finance law.

In the absence of a ministerial decree from the Ministry of the Budget setting out the conditions for application of the exemption, the tax authorities have just clarified that the five (5) year exemption from the business license applies automatically to all companies whose creation date falls between 2019 and 2021.

Grant Thornton

All companies set up during these years which had only benefited from the three-year exemption are granted an exceptional extension of two (2) additional years.

3. Clarification of the application procedures for the reference system for market values of urban land located within a built-up area and for the collection of market values for urban land.

In note no. 00546/MBPE/DGI/DLCD/SDCFI/DCAD/DDCFET/MN/02-2023 dated February 13, 2023, the tax authorities have clarified the application of the benchmarks issued by multiparty communal commissions and those issued by the Commission for the Determination of Reference Market Values for Urban Land and Built Buildings.

The note reminds us that:

- The purpose of the multi-party municipal commissions is to publish a reference list of market values for undeveloped urban land within a built-up area.

  These values are fixed for a period of three years. The market values have been set by the commissions for the period 2021-2023 and recorded in the reference database.

  The market values thus determined and published are used only to determine the tax base for property tax on undeveloped properties, and for taxes on the publication of state decrees (Final concession order and other deeds).

  On the order hand, the Commission for the Determination of Reference Market Values for Urban Land and Built Buildings' purpose is to publish, on an indicative basis, a reference list of minimum values for setting the price of undeveloped urban land in transactions, and for calculating registration and publication duties in the Land Register.

4. Clarification of the procedures for adjusting turnover duty in terms business license

In note no. 00829/MBPE/DGI/DLCD-SDL/oos/01-2023 dated March 02, 2023**,** the tax authorities reiterate that, regarding the calculation and determination of turnover duty, regularization only concerns new companies, for which sales tax is necessarily calculated based on forecast sales.

These companies are required to adjust their turnover duty if their sales forecasts are lower than their actual sales at the end of the year.

Companies that have been in business for more than one financial year are not subject to this adjustment obligation, as sales duty is deemed to have been determined based on sales generated.

5. Establishment of a detailed statement of sales resulting from operations benefiting from a conventional exemption.

In note no. 00837/MBPE/DLCD-SDPD/eamd/01-2023 dated March 03, 2023, the tax authorities introduced the obligation to provide a detailed statement of operations benefiting from a conventional exemption.

In addition to the VAT return summarizing all their operations, the taxpayers concerned will have to complete a specific statement including only those operations benefiting from conventional exemptions.

The statement must be produced in support of the periodic declaration and attached to the exemption certificate, in addition to the statement of deductible taxes.

6. **Cohabitation between Additional Act n°A /SA.5/12/18 on the avoidance of double taxation with respect to taxes on income, capital and inheritance, and the prevention of fiscal evasion and avoidance between ECOWAS member states and Regulation n° 08/2008/CM/UEMOA of September 26, 2008, adopting rules for the avoidance of double taxation within the WAEMU.**

In note no. 01 082 MBPE/DGI/DLCD-SDCFI/MN/03-2022 dated March 23, 2023, the tax authorities clarify the conditions of cohabitation between the provisions of the ECOWAS Additional Act, applicable from January 1er 2022, and the provisions of the WAEMU regulation adopted in 2008.

The note specifies that, notwithstanding the entry into force of the ECOWAS Additional Act, the provisions of the UEMOA Regulations remain applicable.

However, as the Additional Act reflects the most recent will of the parties to the conventions (UEMOA and ECOWAS), priority will be given to the provisions of the said Act in the event of a conflict between two provisions of the two conventions dealing with the same subject.

This clarification applies only to taxes for which the event occurred after the entry into force of the additional act; taxes levied prior to January 1st, 2022, remain subject to the pre-existing provisions of the WAEMU Regulation.
Certain provisions concerning taxation rules applicable to the income of students, trainees and apprentices, methods for eliminating double taxation, exchanges of information and non-discrimination, which are not included in the Additional Act, remain applicable, if they are not contrary to the letter and spirit of the ECOWAS Additional Act.

They thus complement the provisions of the Additional Act, rather than supplanting them.

MAURITANIA

Mauritania's tax news during the first half of the year was marked by the entry into force of the Amending Finance Act for 2023. The purpose of this law is to revise the budget forecasts of the Initial Finance Law, to take account of new measures and commitments by the State. The Finance Act includes a number of tax adjustments:

1. **Modification of Article 59 of the tax code**

Addition of a paragraph 6 establishing the obligation, for companies under agreement or benefiting from exemption from corporate income tax, to declare the amount of their income relating to the financial year ended December 31 of the previous year, under the same conditions as for companies subject to ordinary law.

2. **Reinstatement of the 18% VAT rate on telephony** (Article 230. 2.)

These activities, previously subject to the common rate of 16%, have been subject to a VAT rate of 18% since the law came into force. This rate applies from July 1er 2023.

3. **Introduction of a Special Tax on Telecommunications Services (TSST)** of 5% of sales, with no repercussions.

This new tax is codified in articles 293- bis. to 293- septies. of the tax code.

It is based on the telephone operator's sales, *"including revenues and income from interconnection, active and passive capacity sales and Internet services".*

It is payable on completion of the service or on receipt of payment. The tax rate is 5% of sales. It cannot be passed on to consumers.

It must be declared and paid each month "*under the same conditions and subject to the same guarantees and penalties as value added tax".*

It has been applicable since the second half of 2023.

NIGER

Niger's tax and social security system was marked by the publication of a circular on the application of tax measures introduced by the 2023 Finance Act, and by a note from the National Social Security Council adjusting social security contribution rates.

1. Application of tax measures introduced by the 2023 Finance Act

Act no. 2022-44 of December 06, 2022, the Finance Act for 2023, introduced several changes to various taxes and duties with a view to broadening the tax base, improving tax procedures, and supporting the economy. These changes were specified in a circular n°000011/MF/DGI/DL/CFIDIV.L dated March 13, 2023, from the Tax Administration.

- **Clarifications on corporate income tax (ISB)**

  - ***Deductibility of insurance premiums paid by companies for their employees.***

The deductibility of insurance premiums paid by companies on behalf of their employees was previously only allowed if the insurance contract was of a general nature, i.e., if it covered all employees or one or more specific categories.

The 2023 Finance Act has limited the deductibility of the amount of said premiums to 13% of gross salary.

The deductible portion must be calculated individually for each employee, based on the remuneration received during the year in question.

  - ***Deduction of credit losses by banks and financial institutions***

The deductibility of bad debt losses incurred by banks and financial institutions can only be claimed after the end of the fifth financial year following the year in which the provisions were set aside and following the completion of all collection procedures duly certified by a public official.

In addition, a detailed statement of bad debts must be attached to the annual income tax return.

The statement must contain precise information on the claim, including the date granted, the amount, the loan guarantees, and the amount to be written off.

However, when the diligence carried out results in the recovery of a share of the claim, the related income must be recognized and taxed at ISB unless the loss has not been reinstated in the year of recognition.

Grant Thornton

- ***Deductibility of head office and technical assistance expenses***

The Finance Act capped the deductibility threshold for head office and technical assistance expenses at 20% of income.

In a circular dated March 13, 2023, the tax authorities specify that the income to be considered in determining the deductible portion is the accounting income before allocation of head office and technical assistance expenses.

In the case of a loss-making year, the deductible portion is calculated based on the profit for the last profitable year.

- **Clarification of wage and salary taxes**

In the above-mentioned circular, the tax authorities set out the lump-sum valuation methods for certain benefits in kind granted by companies to their employees, as follows:

- Housing: 20,000 FCFA per room per month, up to a limit of one-third (1/3) of total gross remuneration.
- Furnishings: one-third (1/3) of the value of the dwelling valued on a lump-sum basis
- Electricity : CFAF 50,000 per month
- Water: 15,000 FCFA per month
- Telephone: FCFA 20,000 per month
- Motor vehicle: 20,000 FCFA per vehicle.

The amounts are to be considered independently of the actual value of the benefits.

Benefits in kind not listed are taxable at their actual value.

- **Clarification on income tax on receivables, deposits and guarantees (IRCDC)**

- ***Regarding withholding tax on Nigerien-source debt income received by creditors not domiciled in Niger.***

Previously untaxed, debt income earned by foreigners is now subject to the IRCDC.

The deduction is made by the debtor or the notary responsible for collecting or paying the interest.

However, the creditor and debtor are jointly and severally liable for payment of the tax.

- ***Regarding IRCDC taxation of interest, arrears, and other income from current accounts not subject to income tax in Niger***

The Finance Act for the 2023 budget year has made current account interest included in income from the exercise of an industrial, commercial, or artisanal profession and from mining subject to the IRCDC when this revenue is not subject to income tax in Niger.

The current accounts to be taxed are those where the contracting parties are industrialists, craftsmen, farmers, or miners.

- **Property tax clarification**

The Finance Act 2023 abolished the exemption for new construction of income-producing properties.

In this respect, the tax authorities specify that the taxation of new income-producing buildings only applies to those rented out for residential or professional use.

The measure applies automatically to buildings for which completion declarations are filed with the tax authorities before January 1, 2023.

Buildings started before the aforementioned date are subject to tax if they are declared or certified completed after January 1, 2023.

➢ Synthetic tax clarification

The 2023 Finance Act introduced a two (2) year exemption for newly registered companies under the synthetic tax regime.

The tax authorities specify that this exemption does not exempt the companies concerned from fulfilling their other tax obligations.

To benefit from this exemption, an application must be made on a special form provided by the administration within thirty (30) days of registration.

➢ VAT clarification

In a circular dated March 13, 2023, the tax authorities specify that telecommunications services include the transmission, emission and reception of signals, writing, images, sounds or information of any kind by wire, radio, optical or other electromagnetic means, including the provision of access to global information networks, as well as the assignment and concession of the right to use means for such transmission, emission, or reception.

Under article 218 of the Tax Code, telecommunications services are subject to VAT in Niger when they are supplied to non-taxable persons who are established, domiciled or resident in Niger, regardless of where the supplier is established.

➢ Clarification of registration fees

The 2023 Finance Act extended the proportional duty rate of 10% to deeds of transfer of shares in multi-person companies (in the same way as single-person companies).

➢ Clarification of tax litigation

The tax authorities specify that appeals to the Minister of Finance are now subject to the payment of a deposit representing 15% of the disputed amounts.

In fact, referral to the Arbitration committee for tax appeals (CARFI) and to the Minister of Finance is now subject to payment of the amount.

In addition, the taxpayer is no longer obliged to refer the matter to CARFI but may refer it to the Minister of Finance.

➢ Clarification of tax regimes

The 2023 Finance Act has abolished the criterion (for inclusion in the normal tax regime) based on the surface area of multi-department stores and lowered the sales thresholds for inclusion in the various tax regimes.

Henceforth, taxpayers are classified under a tax regime based on the criterion of sales achieved.

The new thresholds are as follows:

- Normal tax regime: sales more than FCFA 100,000,000 excluding tax
- Simplified regime: sales between FCFA 50,000,000 and FCFA 100,000,000 excluding tax.
- Synthetic tax regime: sales below 50,000,000 FCFA.

2. Introduction of new social security contribution rates

By note no. 000609/CNSS/DG/DRC of July 5, 2023, the National Social Security Council (CNSS) informs taxpayers of the introduction of a new global social contribution rate.

The new overall contribution rate is 21.65%, broken down as follows:

- 16.40% payable by the employer
- 5.25% payable by the employee.

It should be noted that certain professionals (seconded civil servants, apprentices, trainees, and voluntary insured) have specific social security schemes (with overall contribution rates ranging from 6.65% to 16.75%).

DEMOCRATIC REPUBLIC OF CONGO

During the first half of the year, Congolese tax regulations were amended and clarified by acts issued by the Minister of Finance and the Head of tax administration.

1. Clarification of the practical procedures for filing the annual recapitulative declaration of professional tax on remuneration and further details on its application.

Article 19 of the Finance Act 2023 introduced the obligation to submit an annual recapitulative declaration of professional tax on remuneration.

This declaration is the responsibility of all salaried individuals paid by an employer, whether public or private.

The declaration covers remuneration paid during the calendar year preceding the year of application.

The decree of September 28, 2022, issued by the Minister of Finance and the service note no. 01/009/DGI/DLEG/BU/SK/PBC/2023 of January 24, 2023, set out the practical procedures for filing the declaration.

To optimize the completion of the above-mentioned declaration, a specific Tax Number has been assigned to each employee, with the series running from B22 to Z22.
The Tax Number is a means of identification assigned to any individual or legal entity liable to pay taxes or subject to a tax obligation in the Democratic Republic of Congo.

In the case of an employee who works for several employers, the annual recapitulative declaration of professional tax on remuneration is filed under the same Tax Number held by the said employee, mentioning the social denominations of the employers.

To this end, each employer is required to send a list of his or her employees, based on a model prescribed by the tax authorities, to the local tax office in his or her place of business.

However, the employee can be identified directly under the conditions described above, by filling in a dedicated identification form.

The annual recapitulative declaration of professional tax on remunerations must be filed by March 30 of each year with the local tax offices of the taxpayers concerned.

This declaration is sent electronically or on paper and is accompanied by the employee's pay slip in accordance with the model prescribed by the Administration.

Failure to complete the declaration is punishable by a fine of 250,000 Congolese francs, in accordance with article 94 of law no.004/2003 of March 13, 2003, on tax procedure reform.

2. Introduction of a benchmark for the taxation of expatriate remuneration under the professional tax on remuneration (IPR) and the exceptional tax on expatriate remuneration (IERE).

In memo no. 01/034/DGI/DG/DESCOM/CE/UNK/CK/2023, the tax authorities have clarified the minimum taxable base for expatriate remuneration (IPR and IERE).

This minimum base is determined according to the guaranteed inter-professional minimum wages (SMIG) applicable in the countries of origin of the beneficiaries of the remuneration concerned.

These minimum wages are shown in the appendix to the above-mentioned note.

It should be noted that the salaries prescribed as the minimum taxable base are net of tax and excluding benefits.

These salary bases constitute the minimum below which no remuneration can be declared.

These minimum remunerations apply only to the lowest-ranking employees, not to executives.

3. Clarification of the application of the obligation to certify annual financial statements.

Article 42 of the Finance Act 2023 introduced a requirement for certification of financial statements.

The certification requirement applies to all taxpayers and is a condition for the regularity of financial statements.

- **Scope of the certification obligation**

The Minister of Finance specifies that only independent chartered accountants and chartered accountancy firms registered with the Order of Chartered Accountants (ONEC) are authorized to certify taxpayers' financial statements.

- **Certification procedures**

The certification engagement gives rise, for each entity, to the issue of a report sent by the statutory auditor or certified public accountant to the General Tax Directorate before June 30 of each year.

In addition, the certifying professional is required to issue a certification certificate and affix a special stamp or hologram to the taxpayer's financial statements.

Any failure to comply with the certification procedure will result in automatic taxation or prosecution.

If you would like further information, please do not hesitate to contact us.

Your contacts

Jean-Louis Dattié
Senior Partner
T : +225 27 20 30 77 00
E: jean-louis.dattie@ci.gt.com

Charles-Alexandre Koffi
Senior Associate
T : +225 27 20 30 77 00
E: charles.koffi@ci.gt.com

Grant Thornton Tax & Legal Ivory Coast
Plateau, Rue du commerce
Immeuble Nabil 1er floor
T : +225 27 20 30 77 00
F : +225 27 20 30 77 01
E: contact@ci.gt.com